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Via ECF

April 8, 2025

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
U.S. District Court for the Southern District of New York
500 Pearl Street, Courtroom 11A
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
U.S. District Court for the Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD)
(SN) - U.S. Victims of State Sponsored Terrorism Round 6 Deadline

Dear Judge Netburn:

Undersigned counsel write to inform the Court that the U.S. Victims of State Sponsored Terrorism (“VSST”) Fund recently set a June 1, 2025 application deadline for new claimants to participate in the sixth round distribution.¹ New claimants must have an eligible terrorism judgment against a designated state sponsor of terrorism prior to that deadline to be eligible to participate in the VSST Fund’s next distribution. To facilitate review of the remaining undecided motions filed by our law firms, which, collectively, represent about 95% of the families of those killed in the 9/11 Terrorist Attacks, we are providing the ECF numbers for the pending motions, their filing dates and the nature of the claims against the Islamic Republic of Iran (“Iran”), and to advise the court of any additional judgment motions we intend to file in the near future.² Exhibit A annexed to this letter provides a table of these pending motions.

Currently, the *O’Neill* Plaintiffs have three (3) Iran judgment motions pending at ECF Nos. 10326 (motion submitted on behalf of non-U.S. national solatium plaintiffs on September 9, 2024), 10524 (motion submitted on behalf of U.S. national estate and solatium plaintiffs on

¹ See <https://www.usvsst.com/Home/Announcements?id=20250325>.

² We understand that the *Bauer* plaintiffs do not have any outstanding Iran judgment motions and do not anticipate filing an Iran judgment motion prior to June 1, 2025.

Anderson Kill P.C.

The Honorable Sarah Netburn
April 8, 2025
Page 2

November 12, 2024), and 10822 (motion submitted on behalf of U.S. national estate and solatium plaintiffs on April 1, 2025). The *O'Neill* Plaintiffs intend to file one (1) additional motion for judgments against Iran on or about April 17, 2025, assuming Iran defaults in the case *Mary Jelnek, et al. v. Islamic Republic of Iran*, No. 1:24-cv-05520 (GBD)(SN).

Currently, the *Burnett* Plaintiffs have nine (9) Iran judgment motions pending at ECF Nos. 10362 (motion submitted on behalf of U.S. national personal injury plaintiffs on September 16, 2024), 10424 (motion submitted on behalf of non-U.S. national estate plaintiffs on October 15, 2024), 10583 (motion submitted on behalf of U.S. national estate and solatium plaintiffs on December 6, 2024), 10619 (motion submitted on behalf of U.S. national estate plaintiffs on December 11, 2024), 10740 (motion submitted on behalf of non-U.S. national solatium plaintiffs on February 26, 2025), 10744 (motion submitted on behalf of U.S. national estate plaintiffs on February 26, 2025), 10772 (motion submitted on behalf of U.S. national personal injury plaintiffs on March 7, 2025), 10808 (motion submitted on behalf of non-U.S. national solatium plaintiffs on March 26, 2025), and 10814 (motion submitted on behalf of U.S. national estate and solatium plaintiffs on March 28, 2025). The *Burnett* Plaintiffs intend to file at least two (2) additional motions for judgments against Iran in the near future.

Currently, the *Ashton* Plaintiffs have one (1) Iran judgment motion pending at ECF No. 10827, which was filed on April 3, 2025 and seeks damages judgments for one (1) U.S. national's estate and nine (9) solatium judgments for U.S. national immediate family members. The *Ashton* Plaintiffs also have one (1) filed Objections to Reports and Recommendations Regarding Non-Immediate Family Members (ECF Nos. 5387 and 5701) at ECF No. 6123, filed April 6, 2020 which is still awaiting decision. The *Ashton* Plaintiffs intend to file at least one (1) more motion for judgments against Iran in the near future, and prior to the June 1, 2025 deadline.

Currently, the *Burlingame* Plaintiffs do not have any Iran judgment motions pending. The *Burlingame* Plaintiffs anticipate filing at most two (2) motions for judgments against Iran in the near future.

Anderson Kill P.C.

The Honorable Sarah Netburn
April 8, 2025
Page 3

Understanding that the Court's docket is heavy, both concerning matters in this MDL as well as other cases, we respectfully request that to the extent the Court is able to review and decide the motions that are currently pending and the ones that are not yet filed but will be filed prior to the VSST Fund's June 1, 2025 deadline, our clients, whose applications to the VSST Fund for participation in the next round of payments depend on a judgment issued by that deadline (all of which must also be sent for service), would be most grateful.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Attorney for the O'Neill Plaintiffs

Respectfully submitted,

/s/ John C. Duane

John C. Duane, Esq.

Attorney for the Burnett Plaintiffs

Respectfully submitted,

/s/ Megan W. Benett

Megan W. Benett, Esq.

Attorney for the Ashton Plaintiffs

Respectfully submitted,

/s/ Jeanne M. O'Grady

Jeanne M. O'Grady, Esq.

*Attorney for the Burlingame
Plaintiffs*

Cc (via ECF): All MDL Counsel of Record

Enclosure